

**Air Pollution Control Board**

Greg Cox	District 1
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Pam Slater	District 3
Ron Roberts	District 4
Bill Horn	District 5

**Air Pollution Control Officer**

R. J. Sommerville

August 6, 1996

TO: Rule 67.20 Workshop Participants and Other Interested Parties

FROM: Richard J. Smith  
Deputy Director

**PROPOSED RULE 67.20 - MOTOR VEHICLE AND  
MOBILE EQUIPMENT REFINISHING OPERATIONS**

**VOC LIMITS FOR PRIMERS**

The San Diego County Air Pollution Control District will hold a public meeting to consider comments regarding the draft socioeconomic impact assessment and proposed revisions to proposed new Rule 67.20 - Motor Vehicle and Mobile Equipment Refinishing Operations. The meeting is scheduled as follows:

**DATE:** August 21, 1996 (Wednesday)

**TIME:** 1:00 - 4:00 p.m.

**PLACE:** San Diego Air Pollution Control District  
Conference Room 139  
9150 Chesapeake Drive, San Diego

On June 21, 1996, the District mailed a draft socioeconomic impact assessment for Rule 67.20 and a revised copy of Rule 67.20 to workshop participants and other interested parties for comments. The revised rule included proposed changes that raises the volatile organic compound (VOC) limit for all primers and primer surfacers from 250 g/l (2.1 lb/gal) to 420 g/l (3.5 lb/gal) to mitigate the adverse economic impacts identified in the draft socioeconomic impact assessment. The revised rule also eliminates the precoat coating category for use with primers or primer surfacers. These changes to the proposal would have a negligible emissions impact in San Diego.

The District has received written and oral comments on the draft socioeconomic impact assessment and these proposed rule changes. Some comments received by the District stated that these changes will provide an unfair economic advantage to one coating manufacturer and effectively prohibit the use of waterborne coatings (by eliminating the precoat category). Other comments have supported these changes as environmentally sound and helpful in mitigating the economic impact of the proposed rule. In light of these comments, the District is considering the following options:

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- Returning primer and primer surfacer VOC limits to 250 g/l and allowing limited use of a precoat with a VOC limit of 500 g/l.
- Proceeding with the proposed rule as currently drafted.
- Retaining a primer and primer surfacer VOC limit of 420 g/l but allowing a precoat with primers and primer surfacers having a VOC content of 250 g/l or less.

Comments concerning these issues may be made at the meeting scheduled above or provided to the District in writing by August 21, 1996. If you would like a copy of proposed Rule 67.20, please call Juanita Ogata at (619) 694-3307. If you have any questions concerning the proposal, please call Steven Moore at (619) 694-3198, Natalie Zlotin at (619) 694-3312, or me at (619) 694-3303.



for, RICHARD J. SMITH  
Deputy Director

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